

Exhibit 18

The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

ANDRE THOMPSON, a single man; and
BRYSON CHAPLIN, a single man,

Plaintiffs,

v.

CITY OF OLYMPIA, a municipal
corporation and local government entity;
and RYAN DONALD and "JANE DOE"
DONALD, individually and the marital
community comprised thereof,

Defendants.

No. 3:18-cv-05267-RBL

DECLARATION OF
BRYSON CHAPLIN

I, BRYSON CHAPLIN, declare under penalty of perjury under the laws of the
state of Delaware that the foregoing is true and correct.

1. I am over the age of eighteen and am competent to testify to the matters herein and
make this declaration under penalty of perjury under the laws of the State of
Washington.
2. On May 21, 2015, I got caught stealing beer at Safeway, located near Cooper Point
Road in Olympia Washington.

- 1 3. After running from security, my brother, Andre Thompson, and I were walking
- 2 north on Cooper Point Road on the shoulder of the southbound lane. We were
- 3 heading home.
- 4 4. I remember seeing a car and a light, but I didn't think it was the police.
- 5 5. Then I remember my brother saying, "Let's go," as he started running. I too ran in
- 6 that direction.
- 7 6. Then I remember hearing multiple gunshots and running towards the woods.
- 8 7. I remember my brother falling and running again.
- 9 8. I remember running in the woods, hearing sirens and seeing lights.
- 10 9. Then I remember running back towards the house.
- 11 10. I remember my brother running in front of me; him running out of the woods
- 12 towards the road; me jumping out of the woods after my brother; then me falling to
- 13 the ground.
- 14 11. I didn't hear anyone yelling at us to stop. To get on the ground.
- 15 12. I didn't see a police officer.
- 16 13. I just remember running, then falling. I don't remember anything after that.
- 17 14. I never crouched in the bushes as Officer Donald testified.
- 18 15. I never raised my skateboard above my head and walked towards Officer Donald as
- 19 he testified.
- 20 16. I never attempted to strike Officer Donald with my skateboard before I was shot.
- 21 17. I don't remember the police contacting me at the hospital or trying to speak to me.
- 22 18. All I remember is running and getting shot.
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1 DATED this 2nd day of December, 2018, at Federal Way Washington.

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BRYSON CHAPLIN